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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

MARK AARON HAYNIE, BRENDAN
JOHN RICHARDS, THE CALGUNS
FOUNDATION, INC., and THE
SECOND AMENDMENT
FOUNDATION, INC.,

Plaintiffs,

vs.

KAMALA HARRIS, Attorney General
of California, CALIFORNIA
DEPARTMENT OF JUSTICE, CITY
OF ROHNERT PARK, and OFFICER
DEAN BECKER (RP134)

Defendants.

Case No.: 3:10-CV-01255 SI

**STIPULATION and JOINT
ADMINISTRATIVE MOTION and
PROPOSED ORDER**
Re: Case Management

IT IS HEREBY STIPULATED by and between the parties hereto through their respective attorneys of record that the pending Case Management Conference currently set for April 2, 2013 in Courtroom 10, 19th Floor of the U.S. District Court for the Northern District of California should be reset.

The Rohnert Park Defendants and the Plaintiffs are still engaged in earnest self-directed settlement discussions.

1 If a settlement can be reached, then the remaining parties (California
2 Department of Justice and the Plaintiffs) will proceed with setting hearing dates for
3 dispositive motions at the next Case Management Conference.

4 Furthermore, the Plaintiffs and the California Department of Justice are
5 aware that several bill have been introduced in the State Legislature that may
6 moot this case. Those parties may seek another continuance and/or stay to conserve
7 resources of the parties and the Court.

8 The parties propose that the Court reset the Case Management Conference to
9 a convenient date in June of 2013 in order to give the parties engaged in settlement
10 discussions the time necessary to conclude that process or to request formal ADR
11 assistance from the Court.

12 **SO STIPULATED.**

13 Date: March 26, 2013

Date: March 26, 2013

14 /s/
15 Ross Moody,
16 Counsel for Defendants
Harris & California Dept. of Justice

/s/
Donald Kilmer
Counsel for Plaintiffs

17 Date: March 26, 2013

18 /s/
19 Robert W. Henkels
20 Counsel for Defendants
City of Rohnert Park & Becker

21
22 **ATTESTATION FOR COMPLIANCE WITH GENERAL ORDER 45 AND**
23 **LOCAL RULE VIII.B.**

24 I, Donald Kilmer, declare under penalty of perjury under the laws of California
25 and the United States that I have in my possession e-mail correspondence from
26 Ross Moody, and Robert Henkels that the content of this document is acceptable to
all persons required to sign the document. I declare that this document was signed
in San Jose, CA on March 26, 2013.

27 /s/
28 Donald Kilmer
Attorney for Plaintiffs

ORDER

The Case Management Conference currently set for April 2, 2013 is reset to:
(Date) _____, at (Time): _____, in Courtroom 10,
19th Floor of the U.S. District Court for the Northern District of California – San
Francisco. A Joint Case Management Conference Statement shall be filed seven (7)
calendar days before the new date.

Date:

United States District Judge